



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

via e-mail

March 8, 2016
FPU16-192

Ms. Catherine Jerrard
AFCEC/CIBW
706 Hangar Road
Rome, NY 13441

RE: WAFB – ADEQ Comments – ST012 - *Draft Annual 2014 Groundwater Monitoring Report, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center AFCEC/CIBW, Lackland AFB, Texas; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc., Phoenix, Arizona; document dated January 15, 2016

Dear Ms. Jerrard:

Arizona Department of Environmental Quality (ADEQ) Federal Projects Unit (FPU) and ADEQ contractors UXO Pro, Inc. and Praxis Environmental reviewed the referenced document. General and Specific Comments are provided below.

General Comments

1. ADEQ does not concur with the conclusion presented on line 788 that the plume “is adequately defined in all directions.” Lines 739-744 state that the size of the benzene plume increased 24% between November 2013 and November 2014, with increases in benzene concentrations extending the plume to the northeast and southeast. Benzene and naphthalene concentrations were reported at 930 µg/L and 32 µg/L, respectively, in well ST012-W36, located north of the site. Additional characterization is required in this direction. In addition, benzene was reported in wells ST012-W24 (10 µg/L) and ST012-W29 (5.4 µg/L), suggesting characterization to the east is questionable.

Specific Comments:

1. Page 4-2, Line 756. The text refers to “newly installed monitoring well ST012-W30.” However, historical documents, including the 2013 ROD Amendment 2, indicate that well ST012-W30 was installed in 1992. Please provide clarification.
2. Page 5-6, Table 5-2. Please correct the notes below the table, which refer to the “Maximum Containment Level” and “Maximum Containment Level Goal.”

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Closure

ADEQ may add or amend comments if evidence to the contrary of our understanding is discovered; if received information is determined to be inaccurate; if any condition was unknown to ADEQ at the time this document was signed; or if complementary regulatory agencies bring valid and proven concerns to our attention.

Thank you for the opportunity to comment. Should you have any questions regarding this correspondence, please contact me by phone at (602) 771-4121 or e-mail miller.wayne@azdeq.gov.

Sincerely,



Wayne Miller
ADEQ Project Manager, Federal Projects Unit
Remedial Projects Section, Waste Programs Division

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ADEQ Reading and Project File